

24 February 2005

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**Great Lakes**  
CHEMICAL CORPORATION

Via Certified Mail  
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Internal ID # 04-06 follow-up

Document Control Office (7407M)  
U.S. Environmental Protection Agency  
Attention: TSCA Section 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460 - 0001

Great Lakes Chemical Corporation  
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8EHQ-0205-15888

**SANITIZED**

RE: Submission in Supporting Information for Confidentiality Claims Regarding Document Control Number 8EHQ-04-15888 for a Previously Submitted TSCA 8(e) Notification on a research and developmental material of Phenol, isopropylated, phosphate (3:1); (CAS No.: 68937-41-7) [

].  
(When responding, please refer to JAB-04-009).

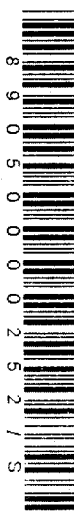
Dear Sir:

**COMPANY SANITIZED**

Pursuant to the request of the Agency, enclosed are two copies of our Supporting Information for Confidentiality Claims in support of our original TSCA 8(e) submission regarding an OECD 421 Reproduction/Developmental Toxicity Screening Test of isopropylated triphenyl phosphate (common name) in rats. One copy has been enclosed within as a separate sealed package and marked CONFIDENTIAL. The second copy has been sanitized for placement in the EPA's Public Files.

SUBSTANTIATION CLAIMS OF CONFIDENTIALITY

1. Is your company asserting this confidential business information (CBI) claim on its own behalf? **Yes.**
2. For what period do you assert your claim(s) of confidentiality? **We are not claiming confidentiality of the chemical, as we provide the CAS No. We are only withholding as confidential its derivation. We request that confidentiality be maintained until we determine that competitors acquiring such information will not be provided an advantage in the market place.**
3. Has the information that you are claiming as confidential been disclosed to any other government agency, or to this Agency at any other time? **No.**
4. Briefly describe any physical or procedural restrictions within your company relating to the use and storage of the information you are claiming CBI. **Distribution of any confidential information is done through a formatted secrecy agreement. Only a few select individuals within the company are aware of confidential information. Files and reports are maintained behind locked archives and locked file cabinets.**
5. If anyone outside the company has access to any of the information claimed CBI, are they restricted by confidentiality agreement(s)? **Yes. Basically the**

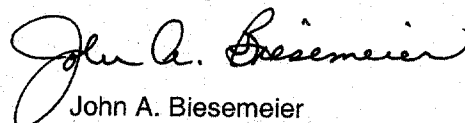


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**agreement states that the information which is identified as confidential shall not be revealed or shared with anyone without the prior written approval of Great Lakes Chemical Corporation.**

6. Does the information claimed as confidential appear or is it referred to in advertising or promotional materials, MSDS, technical data sheets, professional or trade publications, or any other media or publications available to the public or a competitor? **No.**
7. Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? **No.**
8. Describe the substantial harmful effects that would result to your competitive position if the CBI information were made available to the public? **Would allow a competitor full acknowledgement (insight) into our future business strategy and proposed changes in new product development.**
9. Has the substance been patented in the U.S. or elsewhere? **No.**
10. Is the substance/product commercially available and if so, for how long has it been available on the commercial market? **Yes and for 15 years.**
  - a. If on the commercial market, are your competitors aware that the substance is commercially available in the U.S.? **Yes, but they are not aware about its derivation.**
11. Describe whether a competitor could employ reverse engineering to identically recreate the substance. **The issue is not identifying the chemical, as we provide the CAS No. We are only claiming the derivation as confidential.**
12. Do you assert that disclosure of the information you're claiming CBI would reveal confidential processes used in manufacturing the substance; if a mixture, the actual portions of the substance in the mixture; or information unrevealed to the effects of the substance on human health or the environment? **Yes.**
13. Provide the Chemical Abstract Service Registry Number for the product. **68937 - 41 - 7.**
14. Is the substance or any information claimed CBI the subject of FIFRA regulation or reporting? **No.**

Respectfully,



John A. Biesemeier  
Manager, Regulatory Toxicology  
Regulatory Affairs

JAB/jab